

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA** )  
                                    )  
                                    )  
v.                               )     **Case No.: 2:07cr04-MHT**  
                                    )  
**JONATHAN KEITH THOMAS** )

**DEFENDANT'S MOTION TO CONTINUE TRIAL**

**COMES NOW** the Defendant, Jonathan Keith Thomas, through his undersigned counsel, Donnie W. Bethel, and pursuant to 18 U.S.C. §§ 3161(h)(1)(I) and (h)(8)(B)(I), moves this Court to continue the trial in this matter. In support of this Motion, Defendant would show the following:

1. Undersigned Counsel will be out of the Federal Defender's Office from May 15th to 18th on military Reserve duty, and will be in Miami, Florida, for the annual Advanced Federal Defender Seminar from May 29th to June 1st. Also, Undersigned Counsel has two other cases that will go to trial on the June 4th trial term. In light of his travel schedule and the other cases that will go to trial, it will be extremely difficult for Undersigned Counsel to adequately prepare Mr. Thomas's case for trial for the June 4th trial term.

3. Further, it is possible that this case will resolve itself by way of plea, but the parties will need additional time to complete any plea negotiations.

4. Assistant United States Attorney Kent Brunson does not oppose this motion.

5. The ends of justice will be served by a continuance in this case. .

**WHEREFORE**, for the foregoing reasons, Mr. Thomas respectfully requests that his case be continued from the presently scheduled trial term of June 4, 2007.

Dated this 15th day of May, 2007.

Respectfully submitted,

DONNIE W. BETHEL  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 15, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:  
Kent B. Brunson, Esq., Assistant U. S. Attorney, One Court Square, Suite 201,  
Montgomery, Alabama 36104.

Respectfully submitted,

DONNIE W. BETHEL  
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